



UNITED STATES MARINE CORPS
MARINE CORPS COMBAT DEVELOPMENT COMMAND
QUANTICO, VIRGINIA 22134-5001

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MCCDCBul 5500

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12 Sep 03

MARINE CORPS COMBAT DEVELOPMENT COMMAND BULLETIN 5500

From: Commanding General

To: Distribution List

Subj: CONFIDENTIAL FINANCIAL DISCLOSURE REPORT (OGE FORM 450)
AND ANNUAL ETHICS TRAINING

Ref: (a) DoDDir 5500.7-R

Encl: (1) Determining Annual Confidential Financial Disclosure Filers
(2) Sample OGE Form 450, Executive Branch Confidential Financial Disclosure Report with Notes
(3) Common Errors in Preparation of the OGE Form 450
(4) Ethics Training Schedule
(5) Milestones for Filing OGE Forms 450 and Completing Annual Ethics Training

1. Purpose. Paragraph 7-300 of the reference requires that certain military and civilian personnel file an OGE Form 450 and attend annual ethics training. This Bulletin establishes instructions, procedures, and guidelines for filing the reports and attending annual ethics training for MCCDC and MCB, Quantico personnel. Tenant activities, which do not fall under MCCDC, are excluded from these instructions and should check with their counsel or ethics offices for instructions on how to comply with financial disclosure reporting requirements. Training is open to all personnel.

2. Background

a. The Financial Disclosure System prevents conflicts of interest under 18 U.S.C. and appearances of conflicts under 5 C.F.R. 2635.502. The process should focus on individuals in key positions with significant responsibilities affecting outside parties. The goal should be to identify those individuals who have the greatest risk for potential conflicts of interest.

b. The OGE Form 450 is the standardized form used by employees who are required to file an OGE Form 450 in the Executive Branch of the Federal Government.

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c. The filer benefits from the system by reviewing his/her financial interests and recognizing potential conflicts of interest and the filer's supervisor benefits by being made aware of potential conflicts of interest.

3. Processing of the OGE Form 450

a. Who Must File. To determine who must file an OGE Form 450, see enclosure (1). Keep in mind that the employee's immediate supervisor has primary responsibility for determining whether the duties of the position require filing an OGE Form 450.

b. Report Period. The OGE Form 450 report should cover the period from 1 October 2002 through 30 September 2003, with information current as of 30 September 2003.

c. Filing Time

(1) New Entrant. Employees (both military and civilian) must file within 30 days of beginning in a covered position.

(2) Annual. Filed by 14 November 2003.

d. Completing the OGE Form 450. Filers must use the **new** edition of the form dated 9/02, available on-line from the "www.ethics.navy.mil" website under "Quick Downloads." Filers may complete the form on-line, save it, and print a copy for signature and submission to their supervisors. A sample completed OGE Form 450 with notes is included at enclosure (2). A listing of common errors in preparation of the OGE Form 450 is found at enclosure (3).

e. Filing Procedures. The reporting individual will submit the OGE Form 450 to his/her supervisor. The supervisor will forward the form to the division's project action officer (AO). The AO will submit completed forms to the Office of Counsel, MCCDC/MCB Quantico, the local Ethics Counselor (EC).

(1) Duties of the Supervisor. The supervisor will review the report to determine that each item is completed and that there are no actual or apparent conflicts of interest with applicable laws or regulations. Upon completion of the review, the supervisor will sign and date the report and forward it to the division AO.

(2) Duties of the AO. The AO will act as the division liaison between the division and the EC. He/she will collect all forms ensuring that the headings are complete and will forward them as a group to the EC.

f. Privacy. Once an OGE Form 450 is filed with the agency, it is carefully safeguarded to protect the filer's privacy. The OGE Form 450 is a confidential report, protected under the Privacy Act. It may be used for the purposes stated in the instructions on the form. All filed reports are maintained in locked cabinets and passed between offices with the utmost care to ensure that unauthorized personnel do not have access to them.

4. Annual Ethics Training. Everyone who is required to file an OGE Form 450 is also required to attend annual ethics training. The briefing takes about an hour. Training will be held in the third-floor auditorium of the MCCDC Headquarters, 3300 Russell Road. See enclosure (4) for the schedule. The later briefings are usually crowded, so please attend one of the first three briefings if possible.

5. Action

a. Division Directors. The division directors should appoint an AO for this project and forward the name to Kay Lyon, Office of Counsel (C 050), MCCDC/MCB, Quantico, lyonk@nt.quantico.usmc.mil, 703-784-2405, by 19 September 2003.

b. Supervisors. The supervisors should notify all identified employees (see paragraph 3.a.), informing them of their requirement to file an OGE Form 450 and attend one session of ethics training.

c. AOs. The AOs should read enclosure (5) and forward a list of division employees required to file OGE Form 450/attend ethics training to Kay Lyon by 24 September 2003. Additionally, AOs should:

(1) Provide each filer with a blank OGE Form 450 or provide information on obtaining the form on-line (see paragraph 3.d.), and provide dates/times/location of ethics training.

(2) Encourage employees to submit their OGE Forms 450 as soon as they can so that supervisors will have time to review the reports and request clarification if necessary.

(3) Ensure that all OGE Forms 450 are submitted to the Office of Counsel, MCCDC/MCB, Quantico, no later than 14 November 2003 and that all filers attend ethics training.


M. K. HICKS
Chief of Staff

DISTRIBUTION: INTERNET

DETERMINING ANNUAL CONFIDENTIAL FINANCIAL DISCLOSURE FILERS

1. Who Must File

a. Civilian personnel (below SES) or military personnel (below O-7), including detailees, when:

(1) Their duties and responsibilities require them to participate personally and substantially through decision or exercise of significant judgment in taking official action for:

(a) Contracting or procurement;

(b) Administering or monitoring grants, subsidies, licenses, or other Federally conferred financial or operational benefits;

(c) Regulating or auditing any non-Federal entity; or

(d) Other activities in which the final decision or action may have a direct and substantial economic impact on the interests of any non-Federal entity, or;

(2) Their positions require filing to avoid a real or apparent conflict of interest, or to carry out the purpose of any statute, executive order, or regulation applicable to or administered by the employee.

b. The above are determined by the supervisor.

2. Exclusions

a. Personnel who support activities shown in paragraph 1, above, but who do not have significant control over them, should not file an OGE Form 450. For example, clerical personnel in a contracting office would not file an OGE Form 450. Supervisors who direct the activities of OGE Form 450 filers do not have to file unless they exercise significant control over the decisions that affect non-Federal parties.

b. Any DoD employee or group of DoD employees may be excluded from all or a portion of the reporting requirements when the ethics counselor and supervisor determine that a report is unnecessary because of:

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(1) The possibility of any impairment to the integrity of the Federal Government is remote; or

(2) The employee's work is substantially supervised or reviewed.

c. Governmentwide Commercial Purchase Card (GCPC) holders should not automatically file an OGE Form 450. GCPC holders and micro-purchasers making annual purchases totaling less than the simplified acquisition threshold (currently \$100,000 per year) are excluded from the OGE Form 450 filing requirement.

3. Sample Suggested List of Billets Required to File an OGE Form 450

a. Division director.

b. Deputy division director.


c. Branch head.

d. GCPC holders if appropriate (see paragraph 2c above).

4. For assistance in resolving any unique questions or concerns, please contact Edward Ramras at 703-784-3009.

ENCLOSURE (1)

Executive Branch CONFIDENTIAL FINANCIAL DISCLOSURE REPORT

Employee's Name (Last, first, middle initial) Doe, John D.		Position/Title Attorney		Grade GS-905-15	Reporting Status: <input type="checkbox"/> New entrant <input checked="" type="checkbox"/> Annual
Agency DoD /DLSA		Branch/Unit and Address SOCO Room 3D941, Pentagon		Work Phone (703) 697-0000	If New Entrant, Date of Appointment
Check box if special Government employee (SGE) <input type="checkbox"/>		If an SGE, Home Address (Number, Street, City, State and ZIP Code)			
I certify that the statements I have made on this form and all attached statements are true, complete, and correct to the best of my knowledge.				Signature of Employee 	Date 10/1/00
Date Received by Agency	On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (except as noted in "comments" box below).		Signature and Title of Supervisor/Other Intermediate Reviewer (If agency requires)  Jane Smith		Date 10/5/2000
Signature of Agency's Final Reviewing Official and Title		Date	Comments of Reviewing Officials		
(Check box if continued on reverse) <input checked="" type="checkbox"/>					

Part I: Assets and Income

None ☐

Identify for you, your spouse, and dependent children: 1) assets with a fair market value greater than \$1,000 at the close of the reporting period or producing income over \$200, and 2) sources of earned income such as salaries, fees, honoraria (other than U.S. Government salary or retirement benefits, such as the Thrift Savings Plan) which generated over \$200 in income during the reporting period. Earned income sources of your spouse must be reported if greater than \$1,000 (greater than \$200 for honoraria). No earned income needs to be reported for dependent children.

Assets include (but are not limited to): stocks, bonds, tax shelters, real estate, mutual funds, pensions, annuities, IRAs, trusts, commodity futures, trades and businesses, and partnership interests.

Exclude your personal residence, unless you rent it out, and deposit accounts in financial institutions. See instructions for additional exclusions.

Use copies of blank pages for continuation

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Assets and Income Sources (Identify specific employer, business, stock, bond, mutual fund, type/location of real estate, etc.)	(X) if no longer held	Nature of Income over \$200 (Rent, interest, dividends, capital gains, salary, etc.)	Date (Only for honoraria)
Examples			
Rental Condo, Anchorage, Alaska		Rent	
Dee, Jones & Smith, Hometown, USA	X	Salary	
(S) Alexandria Medical Clinic, Alexandria, VA		Salary	
Franklin Equity Mutual Fund		Dividends/Capital Gains	
1 John Doe, Inc. (Tax Consultant) 123 Elm St., Alexandria, VA		Salary	
2 S Jane Doe, Inc. (tutoring business) 123 Elm St., Alexandria, VA		Salary	
3 GE Pension - no control		Pension Payment	
4 IBM Pension, contribution - see attached list			
5 IRA in Franklin Equity Fund		Dividend	
6 S IRA in Shearson Lehman, see attached list			
7 Mutual of Omaha, variable annuity, see attached list			
8 D Long Life, Inc., fixed annuity		Interest	
9 Dreyfus Premier Capital Growth		Dividends	
10 S Dean Witter Reynolds Asset Management Account, see attached list			

Executive Branch CONFIDENTIAL FINANCIAL DISCLOSURE REPORT

Employee's Name (Last, first, middle initial) Doe, John D.		Position/Title Attorney		Grade GS-905-15	Reporting Status: <input type="checkbox"/> New entrant <input checked="" type="checkbox"/> Annual
Agency DoD/DLSA		Branch/Unit and Address SOCO Room 3D941, Pentagon		Work Phone (703) 697-0000	If New Entrant, Date of Appointment
Check box if special Government employee (SGE) <input type="checkbox"/>		If an SGE, Home Address (Number, Street, City, State and ZIP Code)			
I certify that the statements I have made on this form and all attached statements are true, complete, and correct to the best of my knowledge.				Signature of Employee Date	

Date Received by Agency	On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (except as noted in "comments" box below).	Signature and Title of Supervisor/Other Intermediate Reviewer (If agency requires)		Date
Signature of Agency's Final Reviewing Official and Title		Date	Comments of Reviewing Officials (Check box if continued on reverse) <input type="checkbox"/>	

Part I: Assets and Income

None ☐

Identify for you, your spouse, and dependent children: 1) assets with a fair market value greater than \$1,000 at the close of the reporting period or producing income over \$200, and 2) sources of earned income such as salaries, fees, honoraria (other than U.S. Government salary or retirement benefits, such as the Thrift Savings Plan) which generated over \$200 in income during the reporting period. Earned income sources of your spouse must be reported if greater than \$1,000 (greater than \$200 for honoraria). No earned income needs to be reported for dependent children.

Assets include (but are not limited to): stocks, bonds, tax shelters, real estate, mutual funds, pensions, annuities, IRAs, trusts, commodity futures, trades and businesses, and partnership interests.

Exclude your personal residence, unless you rent it out, and deposit accounts in financial institutions. See instructions for additional exclusions.

Use copies of blank pages for continuation

Authorized for local reproduction

Assets and Income Sources (Identify specific employer, business, stock, bond, mutual fund, type/location of real estate, etc.)		(X) if no longer held	Nature of Income over \$200 (Rent, interest, dividends, capital gains, salary, etc.)	Date (Only for honoraria)
Examples	Rental Condo, Anchorage, Alaska		Rent	
	Dee, Jones & Smith, Hometown, USA	X	Salary	
	(S) Alexandria Medical Clinic, Alexandria, VA		Salary	
	Franklin Equity Mutual Fund		Dividends/Capital Gains	
#1	D GM stock	X	Dividends, capital gains	
#2	Commonwealth of Virginia Housing bond		Interest	
#3	State Farm, whole life insurance policy		Interest	
#4	S Merchant Life, variable policy, see attached list			
#5	J 101 Main St., Richmond, VA		Rent	
#6	J Unimproved lot, Blue Ridge, VA, natural gas		Royalties	
#7	Liberty Plaza Association, LP, Wilmington, DE, real estate		Partnership distribution	
#8	The Flower Garden		Honorarium	5/15/2000
#9	Estate of Henry Doe, executor & beneficiary, see attached list		Fee	
#20	S Sam Doe Trust, spouse trustee and child beneficiary, see attached list			

Employee's Name (Last, first, middle initial)
Doe, John D.

Work Phone
(703) 697-0000

Part II: Liabilities

None ☐

Report for you, your spouse, and dependent children liabilities over \$10,000 owed at any time during the reporting period (over \$10,000 at the end of the period if revolving charge accounts). **Exclude** a mortgage on your personal residence unless it is rented out; loans for autos, household furniture or appliances; and liabilities owed to certain family members (see instructions).

Creditors (Name and address)	Type of Liability (Mortgage, promissory note, etc.)
Example J Continental Bank, Alexandria, VA	Mortgage on rental property in Richmond
2 D Sallie Mae, Washington, DC	Student Loan
3 Dean Witter Reynolds	Margin Account in Asset Manager

Part III: Outside Positions

None ☐

Report any positions, whether or not compensated, which you held outside the U.S. Government during the reporting period. Positions include (but are not limited to) an employee, officer, director, trustee, general partner, proprietor, representative, executor, or consultant for a business, non-profit or labor organization or educational institution. **Exclude** positions with religious, social, fraternal, or political entities or those solely of an honorary nature. You need not report any positions of your spouse or dependent children.

Organization (Name and address)	Type of Organization	Position	(X) if no longer held
Example Dee, Jones & Smith, Hometown, USA	Law Firm	Associate	X
1 John Doe, Inc., 123 Elm St., Alexandria, VA	Subchapter "S" corp, consulting	President	
2 Estate of Henry Doe		Executor	
3 National Association of Contract Auditors	Professional Association	Secretary	
4 McClean Gardens Homeowners Association	Howeowners Association	Vice President	X

Part IV: Agreements and Arrangements

None ☐

Report your agreements or arrangements for current or future employment, leaves of absence, continuation of payment by a former employer (including severance payments), or continuing participation in an employee benefit plan. You need not report agreements or arrangements of your spouse or dependent children.

Terms of Any Agreement or Arrangement	Parties	Date
Example Will receive retained pension benefits (independently managed, fully funded, defined contribution plan)	Dee, Jones & Smith, Hometown, USA	2/99
1 Pension Plan - started at age 62	GE	4/1/95
2 Pension Plan	IBM	8/1/86
3 Future Employment Agreement	Boeing	6/1/2000

Part V: Gifts and Travel Reimbursements

Do not complete this part if you are a new entrant or special Government employee.

None ☐

Report for you, your spouse, and dependent children gifts or travel reimbursements you have received from one source totaling more than \$260. **Exclude** anything valued at \$104 or less; anything received by your spouse or dependent child totally independent of their relationship to you; anything from a relative or from the U.S. Government; anything given to your agency in connection with your official travel; and food, lodging, or entertainment received as personal hospitality at the donor's residence or premises.

Source	Description (For travel-related items, include itinerary)	Date
Example Dee, Jones & Smith, Hometown, USA	Leather briefcase as a departing gift	2/99
1 National Association of Contract Auditors	Airline ticket to attend conference in Chicago, IL	6/14/2000
2		
3		
4		

NOTES ON SAMPLE OGE FORM 450

Entries are marked "S" for spouse, "J" for joint and "D" for dependent child. If there is no letter, we assume that the entry belongs to the filer. The lines on the Sample OGE Form 450 are numbered for reference to these Notes. You do not need to number the lines of your Report. We use the following organization for Part I and recommend it for your use: salaries, pensions, IRAs, annuities, mutual funds, stocks, bonds, insurance, property, miscellaneous, estates, and trusts. Within each category, you are listed first, then your spouse, then your dependent child. More than one type of asset is sometimes discussed on one line to save space.

Part I. Assets and Income

1. Your **non-government SALARY**, over \$200 in income, provided by closely held company. For partnerships, closely held companies and small business ventures that are **not publicly traded**, you have to provide the name, location, and description of its activity. Also note that your position with the company is reported in Part III. If you take your compensation from an S corporation as dividends rather than salary, report "shares" as the income. Do not report your government salary.
2. Spouse's salary, provided by closely held company, over \$1000 in income. See Note 1 for additional information. Note that your spouse's position with the company is NOT reported in Part III, as only YOUR positions are reported in that Part. Do not report your dependent children's earned income.
3. Your **PENSION** with GE. For pension plans, you must report the name of the company, and if you cannot control the plan's investments, indicate "no control." These are **defined benefit** plans. When you can't control the investments, you don't have to report them. See the Definitions Section of these Notes for further explanation. When you are not yet receiving payments, indicate "None" in the income block. Because you are receiving payments over \$200, indicate "pension payment." Note that the pension is also reported in Part IV. Do not report any government retirement plan, TSP or Social Security benefits. See Note 4 for another type of pension.
4. Your pension with IBM. This is a **defined contribution** plan, which means that you can select the investment option or control the

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investments in your account, which means that you must report the account's holdings. Report the name of the company, the name of an independent manager, if any, the investment option you select, such as growth, and any selected investments, such as mutual funds or other investments. Do not indicate that you are receiving payments from this type of pension, as they are really withdrawals of your previous investment and are not income. Also report the pension in Part IV. See Note 3 for another kind of pension.

401(k) plans, 403(b) plans, and simplified employee pension plans (SEP), are established by private employers for their employees and offer a limited number of investment options. Report the name of the employer, the type of plan (e.g., 401(k)), and the investment option(s) in which the plan is invested. The investment options are your account's holdings and have to be reported.

5. Your **IRA** account. See the Definitions Section of these Notes for further explanation. You must report the IRA's holdings, e.g., **MUTUAL FUNDS**. For publicly available mutual funds, identify the general family fund name, here Franklin, and the name of the specific fund, here Equity. You do not need to report money market or certificate of deposit IRAs. Keogh plans (HR-10), for self-employed individuals, are comparable to IRAs.

6. Spouse's IRA account. This is a **DIRECTED ACCOUNT** with a brokerage firm, so you must report the account's holdings. These accounts may have different names, including brokerage and portfolio. Even if you allow your broker to make all the decisions, you still have the ability to control your account's holdings, so you need to report them. If the holdings are numerous, you may want to provide a broker's statement tracking the year's holdings, and white out the account number and the values. If the holdings are few, you could list them on the line on which you identify the directed account, or provide a separate typed list.

7. Your **ANNUITY**. See the Definitions Section of these Notes for further explanation. For an annuity, you must report the full name and whether it is fixed or variable. If it is **variable**, you have to report your annuity's holdings. See Note 6 for how to report holdings.

8. Dependent child's annuity. As it is **fixed**, you only need to report the full name.

9. Your **MUTUAL FUND**. For publicly available mutual funds, identify the general family fund name, here Dreyfus Premier, and the name of

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the specific fund, here Capital Growth. You do not need to report money market mutual funds.

10. Spouse's **CASH OR ASSET MANAGEMENT ACCOUNT**. This account often contains assets other than just cash, such as a margin account, which is actually your liability, and various funds. It is not considered a mutual fund. Therefore, you have to report the various holdings of this type of account. If you have a margin account that meets the criteria for reporting in Part II, you also have to report it there. See Note 6 for how to report holdings.

11. Dependent child's **STOCK** in GM. Identify the company and the fact that the asset is stock. Report dividends over \$200 as income. Because the stock was sold, mark "X," and report the increase in value as capital gain type of income.

12. Your **BOND**. Give enough information to identify the source of the bond and its purpose.

13. Your **LIFE INSURANCE** policy. Do not report **term** life insurance policies. For **cash value** life insurance policies, you must report the name of the insurance company and the type of policy. For **whole life** and **universal** policies, just report which one it is. See the Definitions Section of these Notes for further explanation.

14. Spouse's **variable** life insurance policy. For variable policies, you must report the name of the insurance company, that the policy is variable, and the policy's holdings. See Note 6 for how to report holdings.

15. Jointly held **RENTAL PROPERTY**. Note that the mortgage is reported in Part II. You must indicate at least the city and state. You may add whether it is a house, condo or townhouse and the specific address when you have several in the same locality. You don't report your personal residence if you don't rent it out.

16. Jointly held undeveloped property. If it is for investment, you should include the fact that it is unimproved, and the city and state. If you have no income, put "None" in the income column. If the land is being used for a profit, report the type of activity and income.

17. Your investment in a **NON-PUBLICLY TRADED LIMITED PARTNERSHIP**. Because it's not publicly traded, you have to provide the location and description of its activity. If it were a **publicly traded limited partnership**, just list the full name.

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18. Your **HONORARIUM** for speaking at a conference. Note that you have to include the date.

19. Your interest as a beneficiary in a probated **WILL** of a deceased person. You must report that interest if your share of the estate is over \$1000, or if you are receiving income over \$200. Your interest as an executor in a will of a deceased person. If you are receiving a fee for your work as executor, and it is over \$200, also list the fee as income. You must report the estate's holdings, although you do not need to report personal property. Do not list your interest in the will of a living person. Note that your position as an executor is also listed in Part III. See Note 6 for how to report holdings.

20. Dependent child's interest as beneficiary and spouse's interest as trustee in an educational **TRUST** established by you and your spouse for your son. See the Definitions Section of these Notes for further explanation. You would need to report it either because your spouse is the trustee or because your son is the beneficiary. You must report the trust's holdings. Because you are not the trustee, do not report it in Part III. See Note 6 for how to report holdings.

Part II. Liabilities

1. Joint mortgage on rental property listed in Part I, as it is over \$10,000 during the reporting period. Include the name of the bank, and the city and state. You should reference which property, especially if you have more than one. Note that you do not need to report any mortgage on your personal residence.

2. Dependent child's student loan.

3. Your margin account must be listed if it meets the reporting criteria.

Part III. Outside Positions

1. Your position as president of your consulting company. If you make more than \$200 in income, you also need to report it in Part 1. If not, only report it here.

2. Your position as an executor of the estate.

3. Your position as an officer of a professional association. You would not report it if you were only a member.

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4. Your position as an officer of a homeowner's association. As you no longer hold the position, put an "X" in the box.

Part IV. Agreements and Arrangements

1. Your GE pension plan. Include a description of the terms, such as when payments begin. The plan must also be reported in Part I.

2. Your IBM pension plan. Include the dates and parties. The plan must be reported in Part I.

3. Your agreement with Boeing regarding future employment.

Part V. Gifts and Travel Reimbursements

1. Your free ticket, which you received because you are an officer, to attend the conference. Include location and date of trip.

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Salaries	-	Lines 1-2
S Corp	-	Line 1
Pensions	-	Lines 3-4
401(k)	-	Line 4
IRAs	-	Lines 5-6
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DEFINITIONS

Annuities

Fixed. The Company guarantees a specific rate of return.

Variable. The investor has limited options of investment and the return is based on performance of investment.

Excepted Investment Funds (EIF). Investment funds such as mutual funds, common trust funds of banks, defined contribution pension plans, investment trusts and limited partnerships **IF** they meet the criteria. If an investment fund is not an EIF, you must report its holdings. Stock in individual companies and brokerage accounts are not EIFs. The criteria for an EIF are:

a) Widely held (usually more than 100 participants, such as pension plans of medium to large companies) and

b) Independently managed (you have no control over the investments in the fund) and either

c) Publicly traded or available (as most mutual funds) or

d) Widely diversified (no more than 5% of its value in securities of one entity (except U.S. Government) and no more than 20% of its value is in a particular economic or geographic sector).

Excepted Trusts. Trusts that you did not create and in which you have no specific knowledge of the holdings or sources of income. You do not receive any reports. Do not report its holdings.

IRAs. Accounts are individual, so they are not widely held and thus do not qualify as EIFs. They may be invested in EIFs.

Life Insurance

Term. Does not require disclosure.

Cash Value. The types are whole life (also ordinary or straight), in which you have no control over investments; universal, in which you receive a minimally guaranteed rate of return; and variable, in which you choose investments from several options.

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Pensions

Fixed, Guaranteed Pension Payment. The employer makes contributions and guarantees that each employee receives a certain fixed benefit. You cannot control the assets of this pension. Do not report its holdings.

Ability to Control. You may make contributions to a separate account maintained by the employer and receive whatever the investment earns. If you can control or select the types of investment in this account, you must report the account's holdings. If the investment is pooled for a large number of employees and is widely diversified (see EIFs, above), you only have to identify the name of the pool and its manager. Examples of these are 401(k) or 403(b) pensions.

COMMON ERRORS IN PREPARATION OF THE OGE FORM 450

1. The following common errors are found in the preparation of the OGE Form 450:

a. Failure to list the specific name of each mutual fund, as opposed to just listing the name of the fund family. For example, "Fidelity" does not sufficiently identify an asset, but "Fidelity Magellan" does.

b. Failure to list underlying assets of an investment or broker's account. All stocks and other investments independently traded in a broker's account must be reported, even if the broker is making the trades for you. A statement from the broker may be attached as long as it provides all the information required on the OGE Form 450.

c. Failure to identify the name, location, and nature of business of all nonpublic partnerships, closely held corporations, and similar private business ventures.

d. Failure to report the assets of a partnership which is not an "excepted investment fund." Partnerships can be reported without describing the underlying assets only when the interest is a limited partnership, which is publicly available, and purchased from a broker.

e. Failure to list the underlying assets in an IRA account or 401(k) plan in which the filer has control over selecting from among various investment options.

f. Using abbreviations and acronyms that do not fully identify the financial interest.

g. Failure to check the "None" blocks when there are no entries. A reviewer cannot assume the failure was an oversight.

h. Reporting assets and liabilities that need not be reported. For example, bank deposits, money market accounts, U.S. Government securities, personal auto loans, and mortgages on the filer's personal residence do not have to be reported on the OGE Form 450.

i. Failure to report the general nature of the filer's or the filer's spouse's employment outside the U.S. Government.

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j. Failure to identify annuities as fixed or variable. For variable annuities, in which the filer may choose among various investment options, the filer must report the specific investment portfolios, mutual funds, or other investments held in the account.

k. Failure to report the location (city and state) where rental property is located.

l. Failure to report the name and location (city and state) of creditors.

m. Failure to report the correct type of income for income-producing assets. Filers often list IRA, retirement fund, annuity, insurance, etc., as types of income. These are types of assets or accounts. Types of income include dividends, interest, capital gains, rent, salary, fees, etc.

2. Mutual funds and other account numbers, as well as social security numbers should not be disclosed. Although the report is confidential, government officials who review the form do not have a need to know this information.

ETHICS TRAINING SCHEDULE

1. All ethics training sessions will be held in the third-floor auditorium of the MCCDC Headquarters, 3300 Russell Road, on the dates and times indicated below:

Thursday, 2 October	1400 - 1500
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Thursday, 16 October	1000 - 1100
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Wednesday, 22 October	1400 - 1500
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Tuesday, 28 October	1400 - 1500
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2. All identified filers of the OGE Form 450 are required to attend one session of ethics training.

ENCLOSURE (4)

MILESTONES FOR FILING OGE FORMS 450 AND
COMPLETING ANNUAL ETHICS TRAINING

SEPTEMBER

- 19 Division directors appoint a project action officer (AO) and forward name to Kay Lyon at lyonk@nt.quantico.usmc.mil
- 24 AOs forward list of employees required to file OGE Form 450 to Kay Lyon, same as above.

OCTOBER

- 2 Annual ethics training presentation 1400 - 1500
- 16 Annual ethics training presentation 1000 - 1100
- 22 Annual ethics training presentation 1400 - 1500
- 28 Annual ethics training presentation 1400 - 1500

NOVEMBER

- 14 All completed OGE Forms 450 submitted to the Office of Counsel, MCCDC/MCB, Quantico and all ethics training complete.